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Attorneys for Plaintiff  
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ANASTASSIA KREZOUNB,  
aka "Sylvia Kass,"

16 Defendant.  
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No. 8:23-CR-00042-CJC

GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER SEALING (1) GOVERNMENT'S  
SENTENCING POSITION FOR DEFENDANT  
ANASTASSIA KREZOUNB AND VICTIM  
IMPACT STATEMENT AND (2)  
DECLARATION OF ANDREW M. ROACH  
WITH SUPPORTING EXHIBITS

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19 Plaintiff United States of America, by and through its counsel  
20 of record, the United States Attorney for the Central District of  
21 California and Assistant United States Attorney Andrew M. Roach,  
22 hereby applies ex parte for an order that the following documents,  
23 (1) the Government's Sentencing Position for Defendant Anastassia  
24 Krezoub and the Victim Impact Statement and (2) the Declaration of  
25 Andrew M. Roach In Support of the Government's Sentencing Position  
26 and the Supporting Exhibits, be filed under seal.

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1 This ex parte application is based upon the attached declaration  
2 of Andrew M. Roach.

3 On Friday, May 3, 2024, the government spoke with defendant's  
4 counsel, Deputy Federal Public Defender Terra D. Castillo Laughton,  
5 regarding the filing the parties' sentencing positions under seal.  
6 Both the government and the defense agreed to file their material  
7 under seal in light of the protective order, victim's privacy, and  
8 defendant's privacy.

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10 Dated: May 6, 2024

Respectfully submitted,

11 E. MARTIN ESTRADA  
12 United States Attorney

13 CAMERON L. SCHROEDER  
14 Assistant United States Attorney  
Chief, National Security Division

15 /s/ Andrew M. Roach  
16 ANDREW M. ROACH  
Assistant United States Attorney

17 Attorneys for Plaintiff  
18 UNITED STATES OF AMERICA  
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**DECLARATION OF ANDREW M. ROACH**

I, Andrew M. Roach, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in this case.

2. The government requests that the Court file under seal the documents filed concurrently herewith, (1) the Government's Sentencing Position for Defendant Anastassia Krezoub and the Victim Impact Statement and (2) the Declaration of Andrew M. Roach In Support of the Government's Sentencing Position and the supporting exhibits, because the sentencing position and attached exhibits potentially reference the victim's name and other sensitive personal information of the victim and other individuals that is subject to the protective order. The government requests that these documents be filed under seal to prevent further emotional distress to the victim and others. In addition, the government also requests to file this document under seal because the attached exhibits are all subject to the protective order in this case, and it would be unduly burdensome for the government to redact the entirety of the documents.

3. On Friday, May 3, 2024, I contacted defendant Anastassia Krezoub's counsel, Deputy Federal Public Defender Terra D. Castillo Laughton, regarding the filing of the parties' sentencing positions under seal. Both sides agreed to do so in light of the protective order.

4. Should the Court deny this application, the government requests that the documents proposed to be filed under seal be

1 returned to the government, without filing of the documents on the  
2 public docket.

3 I declare under penalty of perjury under the laws of the United  
4 States of America that the foregoing is true and correct and that  
5 this declaration is executed at Los Angeles, California, on May 6,  
6 2024.

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9 ANDREW M. ROACH  
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